

EXHIBIT 6

Phillip Toutant

From: Sandra Burink <shburink@hb-lawoffices.com>
Sent: Wednesday, September 8, 2021 6:12 PM
To: Phillip Toutant
Cc: Anne Peralta
Subject: Re: Londo v. Enright, et al.

Hi Phil,

Let me talk with my client and I will be in touch with you. I have meetings all day tomorrow so please know that I will be back with you as soon as I can.

Have a nice evening,

Sandra

From: Phillip Toutant <phillip@numinenlaw.com>
Sent: Wednesday, September 8, 2021 4:41 PM
To: Sandra Burink <shburink@hb-lawoffices.com>
Cc: Anne Peralta <Anne@numinenlaw.com>
Subject: Londo v. Enright, et al.

Ms. Burink:

This email is a request for concurrence pursuant to Fed. R. Civ. P. 37(a)(1) and L. Civ. R. 7.1(d) concerning as of yet unreceived authorizations for the release of your client's medical records.

On February 12, 2021, Defendants served their Requests for Production of Documents. Request No. 10 requested that Plaintiff "execute and return the attached authorizations for the release of health, employment and other information." Due to a clerical error by my staff, the authorizations were not attached. Instead of expressing willingness to sign authorizations or to request the inadvertently omitted materials, Ms. Rector's response was that there were no documents attached.

On May 12, 2021, Defendants served their Second Requests for Production of Documents, which again requested that Ms. Rector sign authorizations for the release of medical information. No responses to these requests have been received.

Then, at Ms. Rector's deposition on May 24, 2021, I requested that Ms. Rector execute the authorizations for the release of her medical information. She refused to do so.

To date, we have not received authorizations to release Ms. Rector's records. This is important information that my clients need to prepare for trial. My position is that Defendants' Motion for Summary Disposition should be granted, making this a moot issue. However, I cannot count on that and must obtain Ms. Rector's medical records to prepare this matter for trial.

Please advise.

Best,

Phil Toutant

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